

EXHIBIT 4

Page 1

1 JENNIFER JEHN

2 UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 SANDRA GUZMAN,

5 Plaintiff,

6 -against- 09CIV9323 (BSJ) (RLE)

7 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
8 THE NEW YORK POST, and COL ALLAN, in his
official and individual capacities,

9 Defendants.

10 -----X
11 AUSTIN FENNER and IKIMULISA LIVINGSTON,

12 Plaintiffs,

13 -against- 09CIV9832 (BSJ) (RLE)
14 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
15 THE NEW YORK POST and DAN GREENFIELD and
MICHELLE GOTTHELF,

16 Defendants.

17 -----X
18 VIDEOTAPED DEPOSITION OF JENNIFER JEHN

19 New York, New York

20 Tuesday, June 26, 2012

22 REPORTED BY: BARBARA R. ZELTMAN
(BOBBIE)

23 Professional Stenographic Reporter

25 Job Number: 51052

<p style="text-align: right;">Page 14</p> <p>1 JENNIFER JEHN 2 Q How long have you worked for Dow 3 Jones? 4 A Over two years. 5 Q What's your current position with 6 them? 7 A I'm the head of circulation. 8 Q What does it mean being head of 9 circulation; in other words, what are your 10 job duties as head of circulation? 11 A I'm responsible for acquisition and 12 retention and marketing to acquire 13 subscriptions to The Wall Street Journal and 14 all of the products of The Wall Street 15 Journal. 16 Q And prior to two years ago, that 17 is, prior to coming to The Wall Street 18 Journal, what was your employer -- who was 19 your employer? 20 MR. LERNER: Objection. 21 A The New York Post. 22 Q And what was your last position at 23 The New York Post? 24 A I was the Senior Vice President of 25 Marketing, Digital Media and Human</p>	<p style="text-align: right;">Page 15</p> <p>1 JENNIFER JEHN 2 Resources. 3 Q Senior Vice President of Marketing 4 and Human Resources. 5 Is that one job title or did you 6 actually have two job titles? 7 MR. LERNER: Objection. 8 Go ahead. 9 A I was Senior Vice President of 10 Marketing, Digital Media and Human 11 Resources. 12 Q Okay. So that was just one job 13 title? 14 A Yes. 15 Q And how long were you senior vice 16 president of Marketing and Human Resources? 17 MR. LERNER: Objection. 18 Q For the New York Post? 19 A Over five years. 20 Q So as senior vice president of 21 Human Resources, did you basically run the 22 Human Resources Department? 23 MR. LERNER: Objection. 24 A You can answer. 25 A I was responsible for Human</p>
<p style="text-align: right;">Page 16</p> <p>1 JENNIFER JEHN 2 Resources reporting to me. 3 Q Was there anyone in the Human 4 Resources Department at The Post that was 5 senior to you? 6 A No. 7 Q So you were the highest-ranking 8 human resources executive at The Post? 9 A Yes. 10 Q And as senior vice president of 11 Human Resources, who did you report to? 12 A Paul Carlucci. 13 Q And who is Paul Carlucci? 14 A Paul Carlucci is the publisher of 15 the New York Post. 16 Q Do you know who Paul Carlucci works 17 for? 18 MR. LERNER: Objection. 19 A I do not. 20 Q Have you ever been an employee of 21 News Corporation? 22 A No. 23 Q Who hired you -- actually, other 24 than being senior vice president of 25 Marketing and Human Resources, did you have</p>	<p style="text-align: right;">Page 17</p> <p>1 JENNIFER JEHN 2 any other positions at The New York Post? 3 A No. 4 Q So you said you were senior vice 5 president for about five years. That was 6 the entire time that you were at The New 7 York Post; is that correct? 8 A Yes. 9 Q And who hired you to work for The 10 New York Post? 11 A Paul Carlucci. 12 Q And you were never promoted during 13 your time at The Post; you were just at the 14 same position? 15 MR. LERNER: Objection. 16 Do you understand the question? 17 THE WITNESS: I don't 18 understand the question. 19 Q Your job title -- was your job 20 title the same the entire five years you 21 worked for The New York Post? 22 A Yes. 23 Q So would it be fair to say you were 24 never promoted? You came in at a position 25 and you left at the same position, correct?</p>

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1	JENNIFER JEHN	1	JENNIFER JEHN
2	MR. LERNER: Objection.	2	taken.)
3	A I don't know.	3	THE VIDEOGRAPHER: The time is
4	Q Did she work for News America?	4	11:00 a.m. We're back on the record.
5	MR. LERNER: Objection.	5	MR. LERNER: The witness is
6	A I don't know.	6	going to answer the same question
7	Q Does Jordan Lippner work for News	7	about Mr. Lippner.
8	America?	8	MR. CLARK: Could you read back
9	A I don't know.	9	the last question, please.
10	Q Has Jordan Lippner ever told you	10	(Requested portion of record read:
11	who he works for?	11	"Q. Has Jordan Lippner ever told
12	MR. LERNER: Objection.	12	you who he works for?")
13	Don't answer that.	13	(End of read-back.)
14	(Directive to witness.)	14	A No.
15	MR. LERNER: It's privileged.	15	Q Has Jan Constantine ever told you
16	MR. CLARK: Who Jordan Lippner	16	who she worked for in 2009?
17	works for is privileged?	17	MR. LERNER: Objection.
18	Could you explain that one?	18	A No.
19	MR. THOMPSON: Let's take a	19	Q And there were no other lawyers
20	moment. Let's call the Court.	20	that assisted you in learning how to conduct
21	MR. CLARK: Can we go off the	21	an investigation into an allegation of
22	record.	22	employment discrimination?
23	THE VIDEOGRAPHER: The time is	23	MR. LERNER: Objection.
24	10:50 a.m. Going off the record.	24	A I don't recall any others.
25	(A brief recess was	25	Q You mentioned earlier that you had

	Page 36		Page 37
1	JENNIFER JEHN	1	JENNIFER JEHN
2	a number of jobs in HR; is that correct?	2	America FSI?
3	A I worked in HR.	3	MR. LERNER: Objection.
4	Q What was the first job you had in	4	A I received training and support and
5	HR?	5	guidance from our lawyers and employment
6	A I worked in HR for News America	6	lawyers.
7	FSI.	7	Q Can you describe what that training
8	Q And that's News America	8	consisted of?
9	Freestanding Inserts?	9	MR. LERNER: Objection.
10	A Yes.	10	A I don't recall.
11	Q What year did you begin working for	11	Q Do you recall the names of any of
12	News America FSI?	12	these employment lawyers that helped train
13	A I don't remember the exact date.	13	you at News America FSI?
14	Q Do you know the year?	14	A The lawyer would be Jan
15	A Around 1994 or '5.	15	Constantine.
16	Q Is News America FSI a subsidiary of	16	Q Earlier when you spoke about Jan
17	News Corporation?	17	Constantine, were you referring to training
18	A I don't know.	18	you received when you were at News America
19	Q What was your title at News America	19	FSI?
20	FSI?	20	MR. LERNER: Objection.
21	A I don't remember.	21	A Could you repeat that question?
22	Q Can you describe any training you	22	Q Did Jan Constantine provide you
23	received while conducting an investigation	23	training when you were anywhere other than
24	into an allegation of employment	24	during your position at News America FSI?
25	discrimination while you were at News	25	MR. LERNER: Objection.

<p style="text-align: right;">Page 38</p> <p>1 JENNIFER JEHN 2 A I still don't understand what you 3 are asking me. 4 Q Did Jan Constantine help to train 5 you when you were an employee of The New 6 York Post regarding the conducting of an 7 investigation of employment discrimination? 8 A Could you repeat it again? 9 Q Did Jan Constantine help to train 10 you in any HR matters when you worked for 11 The New York Post? 12 A I don't remember. 13 Q So Ms. Constantine may have trained 14 you both at The New York Post and at News 15 America FSI? 16 MR. LERNER: Objection. 17 A I don't recall. 18 Q Were there any other attorneys who 19 helped train you in HR matters when you were 20 at News America FSI? 21 A I don't recall. 22 Q Was there anyone else who helped to 23 train you in HR when you were at News 24 America FSI? 25 MR. LERNER: Objection.</p>	<p style="text-align: right;">Page 39</p> <p>1 JENNIFER JEHN 2 A I don't recall. 3 Q Do you recall any other training 4 that you received in how to conduct an 5 investigation into an allegation of 6 employment discrimination when you were at 7 News America FSI? 8 MR. LERNER: Objection. 9 A I don't recall. 10 Q How long were you at News America 11 FSI? 12 A Could you repeat that question? 13 Q How long were you employed by News 14 America FSI? 15 A I don't remember the specific 16 number of years. Around five. 17 Q And did you have any HR positions 18 other than your position at News America FSI 19 and The New York Post? 20 A Yes. 21 Q What was the next HR position you 22 had after News America FSI. 23 Strike that last question. 24 News America FSI was the first HR 25 job you ever had, correct?</p>
<p style="text-align: right;">Page 40</p> <p>1 JENNIFER JEHN 2 A Yes. 3 Q So after you left News America FSI, 4 what was the next HR job you had after that? 5 A I had HR responsibilities at 6 TV Guide. 7 Q What is the name of the corporation 8 that owns TV Guide? 9 A I don't know. 10 Q Are they a subsidiary of News 11 Corporation? 12 A I do not know. 13 Q What was your job title at 14 TV Guide? 15 A I don't recall. 16 Q Describe any training you received 17 when you were at TV Guide regarding how to 18 conduct an investigation into an allegation 19 of employment discrimination. 20 MR. LERNER: Objection. 21 You can answer. 22 A I had training and advice and 23 support from employment lawyers and legal 24 counsel. 25 Q What were the names of the lawyers</p>	<p style="text-align: right;">Page 41</p> <p>1 JENNIFER JEHN 2 who gave you this training at TV Guide? 3 A I don't remember. 4 Q Was Linda Babajko one of them? 5 I'm sorry. Strike that. 6 Was Jan Constantine one of them? 7 A Yes. 8 Q Did Jan Constantine work for 9 TV Guide during the time that you worked for 10 TV Guide? 11 A No. 12 Q So why was Jan Constantine giving 13 you advice about how to conduct an 14 investigation into employment discrimination 15 when you were an employee of TV Guide? 16 MR. LERNER: Objection. 17 A Jan Constantine was a lawyer in 18 employment who was a resource available to 19 me. 20 Q Why was Jan Constantine a resource 21 available to you as an employee of TV Guide? 22 MR. LERNER: Objection. 23 A She was a resource available to me. 24 Q Wasn't she available to you because 25 TV Guide is a subsidiary of NewsCorp. and</p>

<p style="text-align: right;">Page 42</p> <p>1 JENNIFER JEHN 2 Jan Constantine works for NewsCorp.? 3 MR. LERNER: Objection. 4 A You need to repeat that question. 5 Please, will you repeat that. 6 MR. CLARK: Read it back. 7 (Requested portion of record read: 8 Q. Wasn't she available to you 9 because TV Guide is a subsidiary of 10 NewsCorp. and Jan Constantine works for 11 NewsCorp.?"") 12 (End of read-back.) 13 MR. LERNER: Objection. 14 A No. 15 Q What's the basis for you saying no? 16 MR. LERNER: Objection. 17 A I don't know who Jan Constantine 18 works for. 19 Q So how can you possibly say she's 20 not an employee of NewsCorp.? 21 MR. LERNER: Objection. 22 A I don't know who Jan Constantine 23 worked for. 24 Q Isn't it true that when you worked 25 for News America FSI, Jan Constantine was a</p>	<p style="text-align: right;">Page 43</p> <p>1 JENNIFER JEHN 2 resource available to you because News 3 America FSI is a subsidiary of NewsCorp. and 4 Jan Constantine works for NewsCorp.? 5 MR. LERNER: Objection. 6 A That's not true. 7 Q What's your basis for saying it's 8 not true? 9 A I don't know who Jan Constantine 10 works for. 11 Q So what's your basis for saying 12 it's not true? 13 A I don't know who Jan Constantine 14 works for. 15 Q After TV Guide, did you have any 16 other HR jobs other than New York Post? 17 A I don't recall. 18 Q What year did you -- what was your 19 last year that you worked for TV Guide? 20 A I don't remember the exact year. 21 Q You don't recall if you worked -- 22 had any employment between TV Guide and The 23 New York Post? 24 A I was employed between TV Guide and 25 The New York Post, yes.</p>
<p style="text-align: right;">Page 44</p> <p>1 JENNIFER JEHN 2 Q So you don't recall if any of those 3 jobs involved HR? 4 A I don't recall. 5 Q Who did you work for directly after 6 you left TV Guide? 7 A News America Marketing. 8 Q Is News America Marketing a 9 subsidiary of NewsCorp.? 10 MR. LERNER: Objection. 11 A I don't know. 12 Q Did you work for anyone between 13 News America Marketing and The New York 14 Post? 15 A Yes. 16 Q Who did you work for directly after 17 News America Marketing? 18 A Liquidmetal Technologies. 19 Q Where are they located? 20 A At the time, Tampa Florida. 21 Q And did your job with Liquidmetal 22 involve human resources? 23 A No. 24 Q Did you work for anyone else 25 between Liquidmetal and The New York Post?</p>	<p style="text-align: right;">Page 45</p> <p>1 JENNIFER JEHN 2 A Yes. 3 Q What was your next job after 4 Liquidmetal? 5 A Fortress Technologies. 6 Q And did that job involve human 7 resources? 8 A No. 9 Q Who did you work for directly after 10 Fortress Technologies? 11 A The New York Post. 12 Q At any of your HR positions, did 13 you ever receive training with respect to 14 how to conduct an investigation with respect 15 to sexual harassment in the workplace? 16 MR. LERNER: Objection. 17 A Could you repeat that question? 18 MR. CLARK: Could you read it 19 back, please. 20 (Requested portion of record read: 21 "Q. At any of your HR positions, 22 did you ever receive training with 23 respect to how to conduct an 24 investigation with respect to sexual 25 harassment in the workplace?"</p>

<p style="text-align: right;">Page 54</p> <p>1 JENNIFER JEHN 2 "Q. What other ways would be a way 3 to retaliate against an employee other 4 than losing their job?" 5 (End of read-back.) 6 A If an employee had responsibilities 7 taken away from them because they filed a 8 complaint against their supervisor. 9 Q Any other ways? 10 MR. LERNER: Objection. 11 A I don't remember. 12 Q When you were head of HR in 2009, 13 were employees advised about how to file a 14 complaint of harassment or discrimination? 15 MR. LERNER: Objection. 16 You can answer if you understand 17 the question. 18 A Employees were advised that they 19 can make a complaint to New York Post Human 20 Resources, they can complain to their 21 manager, they can report it to an alert 22 line. 23 Q What is Alert Line? 24 A An alert line is made available to 25 New York Post employees that they can file a</p>	<p style="text-align: right;">Page 55</p> <p>1 JENNIFER JEHN 2 complaint or grievance. 3 Q Who runs this alert line that New 4 York Post employees can call to complain 5 about a complaint? 6 MR. LERNER: Objection. 7 Q To complain about a grievance. 8 A I don't know who runs it. 9 Q Does The New York Post run it? 10 MR. LERNER: Objection. 11 A I don't know. 12 Q Is there one alert line for all of 13 the NewsCorp. subsidiaries? 14 A I don't know. 15 Q From what you described, are there 16 any other ways that an employee can complain 17 about employment discrimination? 18 A An employee can complain to their 19 manager, to Human Resources, anyone in Human 20 Resources, and to the alert line. 21 Q Could an employee of The New York 22 Post complain to an attorney? 23 A Employees at The New York Post can 24 complain to HR, their manager, the alert 25 line. That's who they know they can</p>
<p style="text-align: right;">Page 56</p> <p>1 JENNIFER JEHN 2 complain to. 3 Q Suppose an employee of The New York 4 Post wanted to make a complaint to Jordan 5 Lippner? Would that be acceptable, in your 6 experience as head of HR for The New York 7 Post? 8 MR. LERNER: Objection. 9 Do you understand the question? 10 THE WITNESS: Actually, I don't 11 understand the question. 12 BY MR. CLARK: 13 Q Would it be an acceptable way to 14 complain about employment discrimination for 15 an employee of The New York Post to complain 16 to Jordan Lippner? 17 MR. LERNER: Objection. 18 A New York Post employees can 19 complain to HR, their manager, an alert 20 line. That's who they can complain to. 21 Q So your answer is no, it would 22 not -- complaining to Jordan Lippner would 23 not be an acceptable way in your view to 24 make a complaint about employment 25 discrimination as an employee of The New</p>	<p style="text-align: right;">Page 57</p> <p>1 JENNIFER JEHN 2 York Post? 3 MR. LERNER: Objection. 4 A Can you repeat the question? 5 MR. CLARK: Could you read it 6 back? 7 (Requested portion of record read: 8 "Q. So your answer is no, it would 9 not -- complaining to Jordan Lippner 10 would not be an acceptable way in your 11 view to make a complaint about employment 12 discrimination as an employee of The New 13 York Post?"") 14 (End of read-back.) 15 A Jordan Lippner, as a resource to 16 Human Resources at The New York Post, a New 17 York Post employee could make a complaint to 18 him. 19 Q So it would be an acceptable way to 20 make a complaint if you were an employee of 21 The New York Post? 22 MR. LERNER: Objection. I 23 think the issue is the word 24 "acceptable." 25 I don't know what it means but I</p>

<p style="text-align: right;">Page 234</p> <p>1 JENNIFER JEHN 2 A It was a decision made by consensus 3 by our Executive Committee that the Tempo 4 section was going to be reduced in its 5 frequency, which that decision resulted in 6 the position elimination and that position 7 was the editor's position. 8 Q Who participated in this decision 9 to eliminate Sandra Guzman's position? 10 A The Executive Committee. 11 Q Who does that include? 12 Withdraw that. 13 Was this a decision made at a 14 specific meeting of the Executive Committee? 15 Strike the last question. 16 Who was on the Executive Committee 17 in 2009 when this decision to reduce Tempo 18 was made and to eliminate Sandra Guzman's 19 position? 20 A I don't recall all the members of 21 Executive Committee on that day. 22 Q Who do you recall being on the 23 Executive Committee in 2009? 24 A I recall myself, Col Allan, Paul 25 Carlucci, Michael Racano, Howard Adler, Amy</p>	<p style="text-align: right;">Page 235</p> <p>1 JENNIFER JEHN 2 Scaldone, Patrick Judge, Chris Shaw. 3 Q Was Les Goodstein on the Executive 4 Committee in 2009? 5 A I don't know if Les Goodstein is a 6 member of the Executive Committee. 7 Q Why do you not know if Les 8 Goodstein is on the Executive Committee? 9 MR. LERNER: Objection. 10 A He participants in Executive 11 Committee. I don't know if he's a member of 12 Executive Committee. 13 Q Was Les Goodstein present at the 14 committee meeting in which it was decided 15 that the frequency of Tempo would be reduced 16 which would result in the elimination of 17 Sandra Guzman's position? 18 A I don't recall if he was present 19 specifically. 20 Q What do you mean that "reducing the 21 frequency of the section would result in the 22 elimination of Sandra Guzman's position"? 23 MR. LERNER: Objection. 24 A The Tempo section was going to be 25 produced less, and the editor's position was</p>
<p style="text-align: right;">Page 236</p> <p>1 JENNIFER JEHN 2 eliminated as a result of that. 3 Q So did the Executive Committee 4 decide to eliminate Sandra Guzman's 5 position? 6 A The Executive Committee, yes, did 7 decide to eliminate the position of editor 8 of Tempo. 9 Q Did the Executive Committee decide 10 to lay off Sandra Guzman? 11 A We didn't talk specifically about 12 Sandra Guzman but we decided that the editor 13 position would be eliminated. 14 Q What do you mean "we decided it 15 would be eliminated"? Who are you talking 16 about? 17 A The Executive Committee. 18 Q Did Col Allan have a role in 19 determining to lay off Sandra Guzman? 20 MR. LERNER: Objection. 21 A Yes. He was part of the Executive 22 Committee. 23 Q What did he say at that meeting? 24 A I don't recall. 25 Q What did you say at the meeting?</p>	<p style="text-align: right;">Page 237</p> <p>1 JENNIFER JEHN 2 A I don't recall. 3 Q Do you recall Paul Carlucci saying 4 anything? 5 A I don't recall what he said. 6 Q Do you recall anything said by 7 anyone at that meeting with respect to Tempo 8 and Sandra Guzman? 9 MR. LERNER: Objection. 10 A I recall that we agreed that the 11 Tempo section was going to be reduced and 12 then that would result in the Tempo editor 13 position being eliminated. 14 Q When you say the Tempo section and 15 the editor of Tempo being eliminated, does 16 that necessarily mean that Sandra Guzman 17 would be laid off? 18 MR. LERNER: Objection. 19 A That means that the position of the 20 Tempo editor would have been eliminated. 21 There are options when you have those 22 discussions. 23 We decided that the position, the 24 Tempo position, editor position, was going 25 to be eliminated.</p>